

## Message Text

LIMITED OFFICIAL USE

PAGE 01 STATE 097195  
ORIGIN TRSE-00

INFO OCT-01 AF-10 ISO-00 L-03 ARA-10 EUR-12 SIG-03  
EB-08 COME-00 /047 R

DRAFTED BY: TREAS: MFEINBERG  
APPROVED BY: L/T: AWROVINE  
TREAS: OS: HDROSENBLOOM  
ARA/CAR: DPIERCE  
EUR/NE: SWWORREL

-----033811 151631Z /65

R 150302Z APR 78  
FM SECSTATE WASHDC  
TO AMEMBASSY BANJUL  
AMEMBASSY BRIDGETOWN  
AMEMBASSY FREETOWN  
AMEMBASSY LAGOS  
AMEMBASSY LONDON  
AMEMBASSY VICTORIA  
AMCONSUL BELIZE  
AMEMBASSY LILONGWE

LIMITED OFFICIAL USE STATE 097195

E.O. 11652: N/A

TAGS:EFIN

SUBJECT: U.S.-U.K. INCOME TAX TREATY EXTENSIONS

1. U.S.-U.K. INCOME TAX TREATY OF 1945 WAS EXTENDED TO A  
NUMBER OF BRITISH OVERSEAS TERRITORIES IN 1958, INCLUDING  
ALL ADDRESSEE POSTS. IN ADDITION, TREATY APPLIES IN A  
NUMBER OF STILL DEPENDENT CARIBBEAN TERRITORIES SERVED BY  
AMEMBASSY BRIDGETOWN (SEE PARA 5) AND TO FALKLAND ISLANDS,  
SERVED THROUGH AMEMBASSY LONDON.

LIMITED OFFICIAL USE

LIMITED OFFICIAL USE

PAGE 02 STATE 097195

2. TREASURY NOW REVIEWING STATUS OF THESE EXTENDED TREATIES  
AND CONSIDERING WHETHER, IN VIEW OF TAX LAW AND OTHER  
CHANGES SINCE 1958, AND POSSIBILITY OF NEW TREATY WITH U.K.  
(NOW PENDING FOR RATIFICATION BEFORE U.S. SENATE) TREATIES  
WITH BRITISH TERRITORIES AND FORMER TERRITORIES SHOULD  
REMAIN IN EFFECT, BE MODIFIED OR BE TERMINATED. PRINCIPAL

CONCERN IS WHERE TREATY PARTNER'S TAX LAW PERMITS ABUSE OF BENEFITS OF TREATY (E.G., PERMITS U.S. CONCESSIONS TO FLOW THROUGH TO 3RD COUNTRY RESIDENTS NOT ENTITLED TO BENEFITS OF TREATY.)

3. TO FACILITATE REVIEW, ADDRESSEES REQUESTED TO ASCERTAIN THE FOLLOWING FROM APPROPRIATE LOCAL GOVERNMENT OFFICIALS:

A) DOES LOCAL GOVERNMENT CONSIDER TREATY TO BE IN FORCE?

B) DO THEY WISH TREATY TO REMAIN IN FORCE?

C) ARE THERE PARTICULAR AMENDMENTS THEY WOULD LIKE?

D) IS THERE MACHINERY IN PLACE IN LOCAL TAX ADMINISTRATION TO GIVE EFFECT TO TREATY PROVISIONS (E.G., REDUCED WITHHOLDING RATES, EXEMPTIONS FOR TEMPORARY BUSINESS VISITORS, ETC.)?

4. ADDRESSEES REQUESTED TO FORWARD TEXTS OF INCOME TAX LAWS AND AVAILABLE EXPLANATORY MATERIALS. TREASURY PARTICULARLY INTERESTED IN SPECIAL PROVISIONS RELATING TO FOREIGN INVESTMENT AND THE TREATMENT OF INCOME FROM OFF-SHORE ACTIVITIES. MATERIALS SHOULD BE SENT FOR ATTENTION: H. DAVID ROSENBLOOM, DIRECTOR, OFFICE OF INTERNATIONAL TAX AFFAIRS, TREASURY, WASHINGTON 20220.

5. FOR AMEMBASSY BRIDGETOWN: IN ADDITION TO BARBADOS ITSELF, INFORMATION REQUESTED FOR FOLLOWING U.K. TERRITORIES: LIMITED OFFICIAL USE

LIMITED OFFICIAL USE

PAGE 03 STATE 097195

TORIES: ANTIGUA, MONTserrat, ST. CHRISTOPHER NEVIS AND ANGUILLA, ST. LUCIA, ST. VINCENT AND BRITISH VIRGIN ISLANDS. WE HAVE BEEN ADVISED BY BRITISH THAT DOMINICA WISHES TREATY TO BE TERMINATED. PLEASE CONFIRM THIS. IF THIS INCORRECT, PLEASE FORWARD REQUESTED INFORMATION FOR DOMINICA. ALSO REQUEST INFORMATION FOR GRENADA.

6. FOR EMBASSY LONDON: PLEASE OBTAIN REQUESTED INFORMATION FOR FALKLAND ISLANDS. ALSO, PLEASE ADVISE APPROPRIATE U.K. OFFICIALS SUBSTANCE OF THIS TELEGRAM. CHRISTOPHER

LIMITED OFFICIAL USE

NNN

## Message Attributes

**Automatic Decaptioning:** X  
**Capture Date:** 01 jan 1994  
**Channel Indicators:** n/a  
**Current Classification:** UNCLASSIFIED  
**Concepts:** TAX AGREEMENTS  
**Control Number:** n/a  
**Copy:** SINGLE  
**Draft Date:** 15 apr 1978  
**Decaption Date:** 01 jan 1960  
**Decaption Note:**  
**Disposition Action:** RELEASED  
**Disposition Approved on Date:**  
**Disposition Case Number:** n/a  
**Disposition Comment:** 25 YEAR REVIEW  
**Disposition Date:** 20 Mar 2014  
**Disposition Event:**  
**Disposition History:** n/a  
**Disposition Reason:**  
**Disposition Remarks:**  
**Document Number:** 1978STATE097195  
**Document Source:** CORE  
**Document Unique ID:** 00  
**Drafter:** TREAS: MFEINBERG  
**Enclosure:** n/a  
**Executive Order:** N/A  
**Errors:** N/A  
**Expiration:**  
**Film Number:** D780162-0878  
**Format:** TEL  
**From:** STATE  
**Handling Restrictions:** n/a  
**Image Path:**  
**ISecure:** 1  
**Legacy Key:** link1978/newtext/t19780452/aaaabsdc.tel  
**Line Count:** 104  
**Litigation Code IDs:**  
**Litigation Codes:**  
**Litigation History:**  
**Locator:** TEXT ON-LINE, ON MICROFILM  
**Message ID:** 9d1028ad-c288-dd11-92da-001cc4696bcc  
**Office:** ORIGIN TRSE  
**Original Classification:** LIMITED OFFICIAL USE  
**Original Handling Restrictions:** n/a  
**Original Previous Classification:** n/a  
**Original Previous Handling Restrictions:** n/a  
**Page Count:** 2  
**Previous Channel Indicators:** n/a  
**Previous Classification:** LIMITED OFFICIAL USE  
**Previous Handling Restrictions:** n/a  
**Reference:** n/a  
**Retention:** 0  
**Review Action:** RELEASED, APPROVED  
**Review Content Flags:**  
**Review Date:** 29 apr 2005  
**Review Event:**  
**Review Exemptions:** n/a  
**Review Media Identifier:**  
**Review Release Date:** n/a  
**Review Release Event:** n/a  
**Review Transfer Date:**  
**Review Withdrawn Fields:** n/a  
**SAS ID:** 2955413  
**Secure:** OPEN  
**Status:** NATIVE  
**Subject:** U.S.-U.K. INCOME TAX TREATY EXTENSIONS  
**TAGS:** EFIN, GA, US, UK  
**To:** BANJUL BRIDGETOWN MULTIPLE  
**Type:** TE  
**vdkgvwkey:** odbc://SAS/SAS.dbo.SAS\_Docs/9d1028ad-c288-dd11-92da-001cc4696bcc  
**Review Markings:**  
Sheryl P. Walter  
Declassified/Released  
US Department of State  
EO Systematic Review  
20 Mar 2014  
**Markings:** Sheryl P. Walter Declassified/Released US Department of State EO Systematic Review 20 Mar 2014